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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

JAMES GREIFF,

Defendant.

Adv. Pro. No. 10-04357 (SMB)

**NOTICE OF MOTION AND MOTION FOR
(A) EXPEDITED HEARING AND (B) STAY OF TRIAL PURSUANT
TO RULE 5011(C) PENDING RULING BY THE DISTRICT COURT
ON DEFENDANT'S MOTION TO WITHDRAW THE REFERENCE**

PLEASE TAKE NOTICE that Defendant James Greiff, by his undersigned counsel, will respectfully move the Court, on a date to be determined by the Court, for entry of an order pursuant to Local Rule 9077-1 and Rule 5011(c) of the Federal Rules of Bankruptcy Procedure, (a) expediting a hearing on their motion for a stay and (b) staying further proceedings with respect to the claims asserted against the Defendants in the above captioned adversary proceeding pending a ruling by the United States District Court for the Southern District of New on the Defendant's Motion to Withdraw the Reference of the adversary proceeding for trial by a jury, for the reasons set forth in the accompanying Memorandum of Law and Declaration of Arthur H. Ruegger, and exhibits.

WHEREFORE, Defendant respectfully requests that the Court enter an Order granting the relief requested herein, and such other and further relief as the Court deems just and proper.

Dated: March 9, 2020
New York, New York

DENTONS US LLP

By: /s/ Arthur H. Ruegger
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